

Northampton Central Area Action Plan

Situation Update on Selection of Alternative Options

Northampton Borough Council

Date: August 2012

Situation Update:

This report provides a brief explanation of the reason for selecting the options chosen as opposed to alternatives. It considers:

- The Main Strategic Options considered, and how they were identified
- A comparison of the social, environmental and economic effects of the options and how these were considered in choosing the preferred options, other options considered and why these were rejected.

Issues and Options ensured that a manageable output was gained through consultation and the Sustainability Appraisal process to inform the development of the strategy. The AAP reflects the strong impetus to deliver sufficient floor space to ensure Northampton Central Area's role within the principal urban area within the sub-region and as a principal town within the county is realised. In arriving at the final options presented within the plan, the strategic context and its requirement for regeneration and redevelopment of Northampton's Central Area were central.

The policy justification for the focus on regeneration is set out within the Milton Keynes and South Midlands Sub-Regional Spatial Strategy. This strategic context, has limited the number and range of alternative strategy options that could have been explored through the Sustainability Appraisal process when developing the plan. For example, matters such as the role of Northampton as a Principal Urban Area and the requirement for its regeneration were established at the regional level of the hierarchy of plans. Furthermore, notwithstanding its status, the West Northamptonshire Joint Core Strategy (JCS) also provides certain 'fixes' in relation to the Central Area.

The Sustainability Appraisal does not need to revisit decisions that have been taken in higher order plans that are, themselves, the subject of an SA. However, the AAP is now proceeding in advance of the JCS to examination and adoption. This limits the opportunity to rely on the SA produced in tandem with the Core Strategy. This update outlines the reasons for the choices made around the selected strategy options. It should be read together with the Submission Sustainability Appraisal.

Policy Context:

In shaping the strategy, general conformity with MKSM-SRS Policy 3: Northampton Central Area was required. This policy specified that the Borough Council should deliver a long-term framework for revitalising and upgrading the quality of facilities in the Central Area, through a Local Development Document incorporating:

- An improved range and quality of retail provision through increased comparison and convenience floor space, and linking this into a

- revitalisation of the rest of the Central Area incorporating attractive links to the railway station and waterfront areas;
- Making the Central Area the focus of a range of employment opportunities with a particular emphasis on offices, through to the provision of large office space to small office suites in both new and converted accommodation.

Alternative Options:

Section 5 of the Submission Sustainability Report sets out the appraisal of the reasonable alternatives; in selecting a preferred option, alternatives were considered and assessed before reaching this final stage of plan making. This includes the quantity of development proposed within the plan area, in particular the amount of floor space proposed for retail, office and residential. With regards to these three areas in particular, the preferred option was set as it was in the Pre-Submission Plan as the only reasonable option when taking into account the objectives and geographical scope of the plan. The table below summarises why this was considered the case.

The alternatives ruled out as not being reasonable options have been the subject of an internal assessment against the sustainability assessment criteria, which has simply served to reinforce the conclusions reached at the issues and option stage.

As has been demonstrated throughout the SA process, alternatives have been considered in relation to the provision of sites for a range of uses in the Issues and Options stage and in the Pre-Submission stage.

Defining the Strategy:

The main strategy for delivering the plan's vision and strategic objectives to ensure conformity with higher tier plans is through the provision of adequate retail, employment and housing provision. It is also vital that the plan can demonstrate flexibility in its options to ensure a deliverable supply of sites. The Tables below summarise the justification for the strategy and the possible alternatives.

Office: The target within the plan for office floor space was consistent with the target set out within the WNELS study. This target was reflective of the opportunity and need to regenerate a number of brownfield sites regarded as essential to make the provision required to diversify the existing commercial floor space in line with the ambition set out in the Regional Plan.

This approach has been reinforced by the designation of an Enterprise Zone, also covering a number of the sites within the Central Area. This reinforces a recognised nationally regarded impetus for Northampton to make the most of the commercial opportunities available, of the magnitude set out in the AAP.

Retail: The retail target was derived from technical guidance from CACI in 2010. This target is reflective of wider growth across West Northamptonshire, which is an important driving factor in the regeneration and redevelopment of the Central Area. Moreover, the figure attempts to ensure that Northampton can perform at the level of other Principal Urban Areas, and capture a more reflective market share of the potential retail spend in the area. It was regarded as essential to create the step change required to allow the Central Area to be competitive, vital and viable.

The retail study update by Roger Tymn & Partners (2011) identified a significant additional capacity for Northampton above that shown by CACI. This would have provided the opportunity within the AAP to justify inclusion of additional floor space to that which had been identified before. However, technical evidence in relation to site viability showed that substantial additions to accommodate this floor space were limited. It is noted that more recent evidence, produced by Roger Tymn and partners (2012), specifies a much lower overall target for retail to meet Northampton's needs, at a level comparable with the work of CACI. By essentially retaining the target figure set out to address the CACI study, the AAP is consistent with the NPPF and will ensure a flexible supply of sites to meet the future retail needs of Northampton.

Residential: Whilst residential development is not a driver for the economy per se, the repopulation of the Central Area is vital to ensuring resilience and a more balanced, mixed and vibrant town centre. Furthermore, residential development that is regarded as available and desirable is important to the overall flexibility of the plan more generally. Residential development, particularly on brownfield sites also helps to ensure that these areas are sustainable, through a mix of land uses, and are viable in order to assist the overall aims and aspirations of the plan.

Policy and Site Specific Appraisals: The results of the Appraisal of policy and site specific options are contained within Table 6b of the Submission Sustainability Appraisal.

Alternative Strategies

Office

| Plan Strategy | Alternatives | Assessment of Alternative/ Justification |
|--------------------------------------------------------|-----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Requirement of 132,500 sq. m through identified sites. | Specify a lower floor space requirement | <p>The West Northamptonshire Employment Land Study, 2010 was commissioned to determine policy direction and site-specific allocations for both the JCS and the AAP. The study concluded that Northampton's town centre should be the catalyst for office employment growth.</p> <p>The town centre has a limited recent track record in delivering large-scale office development. This is primarily because of the limited availability of speculative office and uncomplicated greenfield sites. The study states that the AAP has a role to play in creating and stimulating demand for employment opportunities in the Central Area. A lower floor space figure, than that derived through identified need would not have met the economic requirements of Northampton. It would essentially reinforce previous trends for out of centre development and not reflect the 'town centre first' approach for main town centre uses as set out in the NPPF. It would not create the step change for office development and the associated change in role of the Central Area as identified within RSS and would have been contrary to the objective assessment of sites available to meet identified demand as set out in WNELS.</p> <p>This option would not meet the objectively assessed need or the strategic objectives for the town centre and would therefore not be a sound approach to take. It is not considered a reasonable alternative.</p> |
| | Specify a higher floor space | With the economic downturn, there is a greater need to focus on how demand for office floor space could be stimulated in the Central Area. An increased |

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| | requirement | floor space figure might have presented an alternative strategy for increasing economic activity and it would score positively on a number of sustainability objectives, particularly in the shorter term. However, the evidence base did not support its deliverability. For these reasons it was not considered a reasonable alternative. |
| | Figure without identified and allocated sites | <p>The AAP could have provided a figure for office/ employment, without identifying sufficient sites. However, this is not a reasonable option.</p> <p>There is an expectation of certainty with an AAP not least because of the emphasis on delivery. Such certainty also allows for a proper evaluation in terms of its impact on sustainability considerations. Without the identification of all, or indeed a significant number of the sites, the deliverability of the Plan is likely to be called into question. The SA identified a number of unknown of significant adverse impacts on the receptors.</p> <p>Pursuing such a strategy would not meet the aims and objectives of the higher tier plan and, therefore, it is not a reasonable alternative.</p> |

Retail

| Plan Strategy | Alternatives | Assessment of Alternative/ Justification |
|-----------------------------|-----------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Requirement of 61,000 sq. m | Specify a lower floor space requirement | Independent technical evidence has indicated that, of the total floor space required across the plan area, that a <i>substantial element</i> should be directed towards that town centre. This addresses its historic underperformance and provides the step change required to ensure it became more vital and viable in the future. |

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| | | <p>Specification of a lower figure would not meet the future needs identified in the technical evidence and would not allow for the regeneration of a number of key sites within the town centre. A lower requirement would not address the need to enhance the importance of Northampton Central Area in the overall retail hierarchy to ensure that it becomes the central retail focus for its catchment. This was not a reasonable alternative</p> |
| | Specify a higher floor space requirement | <p>In order to be sound, the AAP must be deliverable. In considering the retail requirement, independent technical studies were utilised to identify the overall need and sites selected to meet this need. Although in theory a higher requirement could have been included within the plan, this would have required identifying sites, which were unlikely to be deliverable, and would have distracted the focus from the key Grosvenor Centre redevelopment.</p> <p>The most recent retail studies have identified a lower overall requirement for retailing within Northampton, which reinforces the conclusion that this was not a reasonable alternative. The identified sites have all been assessed against the overall SA objectives.</p> |
| | Figure without identified and allocated sites | <p>The provision of a figure for retailing, without identifying specific sites for delivery has a number of adverse impacts on the Sustainability receptors. Therefore, it is not considered a reasonable alternative.</p> <p>Furthermore, there is an expectation of certainty with an AAP not least because of the emphasis on delivery. Such certainty also allows for a proper evaluation in terms of its impact on sustainability considerations. Without the identification of all, or indeed a significant number of the sites, the deliverability of the Plan is likely to be called into question.</p> <p>Pursuing such a strategy would not meet the aims and objectives of the higher tier plan and was not a reasonable alternative.</p> |

Residential

| Plan Strategy | Alternatives | Assessment of Alternative/ Justification |
|-------------------------------|-----------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Requirement of 3400 dwellings | Specify a lower figure | <p>The figure within the preferred policy represents an assessment of viability undertaken at the time of the master plans. It reflects the need to attain appropriate levels of development value to overcome site constraints, e.g. contamination, or infrastructure requirements.</p> <p>A significantly lower figure is likely to result in the sites being unviable, and therefore given the development value associated with other potential uses, unlikely to be able to be regenerated to meet the vision set out in the AAP.</p> |
| | Specify a higher figure | <p>A higher figure would have conflicted with the need to meet the assessed need for offices and retail because it would have required the allocation of sites more appropriately used for retail and offices for housing instead. This would, in turn affect the overall supply of land (which has been identified in the technical employment land study as one of the reasons for the decline in the office market for Northampton's Central Area).</p> <p>Given the objectives of the AAP, and the results of the appraisal, this was not considered a reasonable alternative.</p> |
| | Figure without identified and allocated sites | <p>The AAP could have provided a figure for residential without identifying specific sites for delivery. However, this was not a reasonable alternative.</p> <p>There is an expectation of certainty with an AAP not least because of the emphasis on delivery. Such certainty also allows for a proper evaluation in terms of its impact on sustainability considerations. Without the identification of</p> |

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| | | all, or indeed a significant number of the sites, the deliverability of the Plan is likely to be called into question. |
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